

In re:	:	Case No. 20-61029
	:	(Jointly Administered)
FIBERCORR MILLS, LLC	:	
	:	
<i>et al.</i> <sup>1</sup>	:	Chapter 11
	:	
Debtors and	:	Judge Russ Kendig
Debtors-in-Possession.	:	
	:	

Krugliak, Wilkins, Griffiths, & Dougherty, Co., LLP (“KWGD”), special counsel for the Debtors and Debtors in Possession (the “Debtor”) in the above-captioned case, and hereby makes its first and final application for an allowance of compensation for professional services rendered and for reimbursement of expenses incurred (the “Compensation Period”).

<sup>1</sup> The Debtors are FiberCorr Mills, LLC (EIN xx-xxx3852) Case No. 20-61029, Cherry Springs of Massillon II, LLC (EIN xx-xxx1706) Case No. 20-61030, and Shew Industries Inc. (xx-xx0322) Case No. 20-61031.

A. Retention of KWGD.

KWGD was retained as special counsel for the Debtors effective as of, pursuant to the Court's Order entered, Docket No. 223. A copy of the Order authorizing the retention of KWGD is attached to this Application as Exhibit A. KWGD has not shared any compensation with any other entity and no agreement to share compensation exists between KWGD and any other entity.

B. Compensation and Reimbursement of Expense Requested.

In accordance with sections 330(a) and 331 of the Bankruptcy Code and Federal Rule of the Bankruptcy Procedure 2016, as well as the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses, issued on January 30, 1996 (the "Trustees' Guidelines" KWGD provided a total of 35.60 hours of services to the Debtor for total fees of \$7,755.00. KWGD maintains daily time entries, which are prepared contemporaneously with the rendition of services to the Debtors. These time records set forth the dates on which services were rendered, a summary description of such services, and the time spent each day delivering such services. A schedule of such services provided during the Compensation Period and summary are attached to this Application as Exhibit B. The blended hourly billing rate for KWGD's services to the Debtors during the Compensation Period is \$217.34.

1. Services Rendered by KWGD.

Set forth below is a summary description of KWGD's principal activities during the Compensation Period, broken down by billing categories:

a) General Matters.

KWGD has included in this category time charges for its miscellaneous matters including appointment and application of fees.

b. Employment Matters.

KWGD has included in this category time charges for representation of Debtors matters related to Debtors worker compensation claims, VSSR claims, unemployment matters and general employment matters.

2. Actual and Necessary Expenses and Disbursements

KWGD seeks reimbursement for actual expenses (“Expenses”) incurred in the rendition of services during the Compensation Period in the sum of \$27.60. KWGD submits that such Expenses were reasonable and necessary in light of the services provided. A schedule of expenses is attached hereto as Exhibit C. KWGD utilized the following procedures with respect to the Expenses incurred in rendering services during the Compensation Period:

- a. No amortization of the cost of any investment, equipment, or capital outlay is included in the Expenses, and KWGD does not make a profit on any Expense. In addition, for those items or services that KWGD justifiably purchased or contracted for from a third party (such as outside copy services), KWGD seeks reimbursement only for the exact amount billed to KWGD by the third party vendor and paid by KWGD to the third party vendor.
- b. Photocopying by KWGD was charged at \$.12 cents per page.
- c. Color Photocopying by KWGD was charged at .18 cents per page.
- d. Fax transmittals by KWGD was charged at .50 cents per page.
- e. Telephone charges were charged at the actual rate.

C. Relevant Legal Standards.

1. Compensation.

To grant a request for compensation pursuant to section 330 of the Bankruptcy Code, a court must find that such request is reasonable. The reasonableness of a compensation request is determined by the lodestar method:

The Supreme Court has made it clear that the lodestar method of fee calculation is the method by which federal courts should determine reasonable attorney's fees under federal statutes that provide for such fees.

Boddy v. United States Bankruptcy Court (In re Boddy), 950 F.2d 334, 337 (6<sup>th</sup> Cir. 1991); see also In re White Motor Credit Corp., 50 B.R. 885, 890 (Bankr. N.D. Ohio 1985). The lodestar amount is calculated by multiplying the number of hours reasonably expended by the reasonable hourly rate of a professional. White Motor, 50 B.R. at 890. There is a strong presumption that the lodestar product is reasonable under section 330 of the Bankruptcy Code. See Pennsylvania v. Delaware Valley Citizens' Council for Clean Air, 478 U.S. 546, 565 (1986); In re Drexel Burnham Lambert Group, Inc., 133 B.R. 13, 22 (Bankr. S.D.N.Y. 1991).

KWGD's fees are not unusual and are commensurate with fees that other lawyers of comparable experience and expertise charge on a regular basis in chapter 11 cases. KWGD's lodestar calculation is based upon hourly rates that are will within the range of rates that are charged by comparable firms in other bankruptcy cases. Accordingly, KWGD's lodestar calculation is reasonable under section 330 of the Bankruptcy Code. See Drexel Burnham Lambert, 33 B.R. at 22.

## 2. Expenses.

Sections 330(a)(2) and 503(b) of the Bankruptcy Code permit reimbursement for actual, necessary expenses. See White Motor, 50 B.R. at 891-92. As noted above, KWGD has already conducted a review process and has eliminated the Expenses deemed to be unnecessary.

Accordingly, those Expenses for which reimbursement is sought in this Application satisfy the standards presented by section 330(a)(2) of the Bankruptcy Code and the Guidelines.

D. Case Status.

At the present time, the sale of the Debtors' assets has closed and the case is pending conversion to chapter 7 after the Debtors distributes the balance of the professional fee carve out and the remaining funds held by the Debtors to Premier Bank.

E. Conclusion.

For all of the foregoing reasons, the Debtors believe that the fees requested in this Application are reasonable and reflect the value of the services provided to the Debtors. Moreover, KWGD has requested reimbursement only of actual and necessary expenses. In accordance with the Guidelines, David E. Butz has certified that KWGD's billing practices for the Debtors and this Application conforms to the Guidelines. Such certification is attached to this Application as Exhibit D.

WHEREFORE, Krugliak, Wilkins, Griffiths, & Dougherty, Co., LLP respectfully requests that the Court enter an order in the form attached hereto as Exhibit E (a) granting KWGD as a final allowance of compensation in the amount of \$7,755.00 for services rendered to the Debtors in connection with the Debtors' chapter 11 cases during the Compensation Period; (b) approving the reimbursement of expenses incurred in the representation of the Debtors during the Compensation Period in the amount of \$27.60 and (c) authorizing and directing the Debtor to pay KWGD the unpaid fees and reimbursable expenses authorized by the Court attributable to the Compensation

Period in the amount of \$7,782.60; and (d) granting such other and further relief as the Court may deem proper.

Respectfully submitted,

/s/ Anthony J. DeGirolamo

Anthony J. DeGirolamo (0059265)

3930 Fulton Dr. N.W., Ste. 100B

Canton, Ohio 44718

Telephone: (330) 305-9700

Facsimile: (330) 305-9713

E-mail: [tony@ajdlaw7-11.com](mailto:tony@ajdlaw7-11.com)

COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION

## **EXHIBIT A**

The court incorporates by reference in this paragraph and adopts as the findings and orders of this court the document set forth below. This document was signed electronically at the time and date indicated, which may be materially different from its entry on the record.



**Russ Kendig**  
**United States Bankruptcy Judge**

Dated: 12:35 PM December 7, 2020

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION, CANTON**

-----X  
In re: : Case No. 20-61029  
: (Jointly Administered)  
FIBERCORR MILLS, LLC :  
:   
:   
et al.<sup>3</sup> : Chapter 11  
:   
Debtors and : Judge Russ Kendig  
Debtors-in-Possession. :  
:   
-----X

**ORDER AUTHORIZING THE DEBTOR TO RETAIN AND EMPLOY  
KRUGLIAK, WILKINS, GRIFFITHS, & DODUGHERTY, CO., L.P.A. AS SPECIAL  
COUNSEL FOR THE DEBTOR**

This matter coming to be heard on the Application of the Debtor for Authority to Retain and Employ Krugliak, Wilkins, Griffiths, & Dougherty, Co., L.P.A. (“KWGD”) as Special

<sup>3</sup> The Debtors are FiberCorr Mills, LLC (EIN xx-xxx3852) Case No. 20-61029, Cherry Springs of Massillon II, LLC (EIN xx-xxx1706) Case No. 20-61030, and Shew Industries Inc. (xx-xxx0322) Case No. 20-61031.



Counsel Bureau of Workers' Compensation and employment matters for the Debtors effective the petition date (the "Application"), filed by the debtors and debtors in possession the above-captioned chapter 11 cases (the "Debtors"); the Court having reviewed the Application and the Disclosure of Compensation and Verified Statement of David E. Butz attached to the Application as Exhibit A (the "Verified Statement"), the Court finding that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (c) venue of this chapter 11 case and the Application is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and (d) notice of the Application was sufficient under the circumstance; and the Court having determined that the legal and factual bases set forth in the Application and the Verified Statement establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Application shall be, and hereby is, GRANTED.
2. Capitalized terms not otherwise defined herein have the meanings given to them in the Application and the Verified Statement.
3. The Debtor is authorized to retain and employ KWGD as special counsel to represent the Debtors for Bureau of Workers' Compensation and employment matters effective the petition date in their chapter 11 cases, pursuant to section 327(e) of the Bankruptcy Code or Bankruptcy Rule 2014, and the terms set forth in the Application.

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4. KWGD shall be compensated for such services and reimbursed for any related expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules , and any other applicable orders of this Court.

# # #

PREPARED BY:

Anthony J. DeGirolamo (0059265)  
3930 Fulton Dr., Ste. 100B  
Canton, Ohio 44718  
Telephone: (330) 305-9700  
Facsimile: (330) 305-9713  
E-mail: [ajdlaw@sbcglobal.net](mailto:ajdlaw@sbcglobal.net)

COUNSEL FOR THE DEBTOR  
AND DEBTOR IN POSSESSION

### CERTIFICATE OF SERVICE

I hereby certify that on December \_\_, 2020, a copy of the foregoing Order was electronically transmitted via the Court's CM/ECF system to those listed on the Court's Electronic Mail Notice list:

- Edwin H. Breyfogle edwinbreyfogle@gmail.com, breyfogleer84552@notify.bestcase.com
- Jerry M. Bryan jbryan@hendersoncovington.com
- Anthony J. DeGirolamo tony@ajdlaw7-11.com, amber@ajdlaw7-11.com;G23630@notify.cincompass.com
- Wade T. Doerr wade@nwm-law.com
- Melody A. Dugic mgazda@hendersoncovington.com
- Terri Jane Freedman tfreedman@csglaw.com
- Patricia B. Fugee patricia.fugee@fisherbroyles.com, cpbf11@trustesolutions.net
- Richard S. Lauter Richard.Lauter@lewisbrisbois.com
- Benoit Marc Letendre ben@letendregroup.com, heather@letendregroup.com
- Marc Merklin mmerklin@brouse.com, tpalcic@brouse.com;mmiller@brouse.com
- Tricia L. Pycraft tpycraft@ccj.com, bowman@ccj.com
- Scott N. Schaeffer scott@ksrlegal.com
- Mark Schlachet markschlachet@me.com, mecool818@aol.com
- Anne Piero Silagy asilagylawfirm@neo.rr.com
- Meleah Skillern Meleah.Kinlow@lewisbrisbois.com, Gail.Richards@lewisbrisbois.com
- Robert E. Soles bsoles@soleslaw.com, cmorrow@soleslaw.com
- Richard J. Thomas rthomas@hendersoncovington.com, mgazda@hendersoncovington.com
- United States Trustee (Registered address)@usdoj.gov
- Phyllis A. Ulrich bankruptcy@carlisle-law.com, bankruptcy@carlisle-law.com
- Chrysanthe E. Vassiles cvassiles@bmsa.com, wpoling@ecf.courtdrive.com;cvassiles@ecf.courtdrive.com
- Scott R. Belhorn ust35 Scott.R.Belhorn@usdoj.gov
- Kate M. Bradley ust44 kate.m.bradley@usdoj.gov

---

Deputy Clerk

The undersigned hereby certifies that a copy of the foregoing Order was served via regular U.S. Mail, postage prepaid, upon those listed below, this \_\_\_ day of December, 2020.

\_\_\_\_\_  
Deputy Clerk

Ally Bank  
P.O. Box 130424  
Roseville, Minnesota 55113-0004

Central Funding LLC  
1400 Preston Road Suite 115  
Plano, Texas 75093-5159

Hanmi Bank  
3660 Wilshire Boulevard, Suite PH-A  
Los Angeles, California 90010-2719

Chrysler Capital  
P.O. Box 660647  
Dallas, Texas 75266-0647

Citizens Bank NA  
1 Citizens Bank Way #JCA115  
Johnston, Rhode Island 02919-1922

Equipment Finance Corp.  
219 Roswell Street  
Alpharetta, Georgia 30009-7930

## **EXHIBIT B**

Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 02/24/2021  
Page No. 1  
Source DEB/EDM  
Invoice No. 392788  
Period Ending 02/23/2021

Matter Info: 14226.21-0001  
SPECIAL COUNSEL FOR DEBTOR APPOINTMENT

**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Inits	Description	Hours	Amount
07/13/20	DEB	Review of application.	1.00	295.00
07/13/20	MHP	Review of application for appointment of special counsel including schedules for Creditors including 20 largest for conflict check.	0.80	100.00
07/15/20	MHP	Review of conflict check and information from accounting.	0.40	50.00
07/23/20	MHP	Review of creditors list and dictated list of clients.	0.80	100.00
07/29/20	DEB	Continued review of application.	0.30	88.50
07/30/20	MHP	Review of draft letter re budget on workers comp matters and email to Attorney Murray re same.	0.40	50.00
08/12/20	DEB	Phone conference with BK counsel re: discussion of conflicts.	0.30	88.50
08/14/20	DEB	Final review of application.	0.20	59.00
08/14/20	MHP	Conference with Attorney Murray re budget for workers comp matters and finalized letter and emailed same to debtors counsel.	0.40	50.00
08/25/20	MHP	Review of debtor counsel response to our fee application and analysis of firms invoices re debtor name and amounts of claims, including conference with Attorney Butz re analysis.	0.80	100.00
09/10/20	SOS	Email from Paralegal Helmick re: FiberCorr analysis.	0.10	28.50



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.21-0001  
SPECIAL COUNSEL FOR DEBTOR APPOINTMENT

DATE 02/24/2021  
PAGE NO. 2  
INVOICE NO. 392788

Date	Init	Description	Hours	Amount
09/29/20	SOS	Attention to analysis and message to Attorney Murray re: same.	0.50	142.50
10/02/20	SOS	Conference with Attorney Murray re: preference action, waiver of claim, and related issues.	0.20	57.00
11/16/20	MHP	Email from Amber re revised application for appointment of counsel.	0.20	25.00
12/28/20	MHP	Review of docket re filing of Order and emailed group to advise of appointment.	0.80	104.00
01/13/21	RMW	Prepared annual meeting letter to David Shew.	0.30	42.00
01/31/21	MHP	Attention to generating invoices and preparing for sending to group.	0.50	65.00
02/04/21	MHP	Prepared email and forwarded invoices to group.	0.20	26.00
02/05/21	MHP	Email from debtors counsel re fee application.	0.10	13.00
02/10/21	MHP	Email from debtors counsel with fee application format and intital review of same.	0.50	65.00
02/19/21	MHP	Call to Amber re filing of fee applications and motion to convert	0.20	26.00
02/22/21	DEB	Reviewed fee application and related schedules.	1.00	300.00
02/22/21	MHP	Revisions to fee application and preparation of schedules/exhibits re same.	1.20	156.00
Total Professional Charges				2,031.00
			Total Fees	\$2,031.00
			Total Expenses Advanced	\$0.00
Invoice Total				<u><u>\$2,031.00</u></u>





**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info:	14226.21-0001	DATE	02/24/2021
	SPECIAL COUNSEL FOR DEBTOR APPOINTMENT	PAGE NO.	3
		INVOICE NO.	392788

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This notification is the result of a recent update to the Ohio Rules of Professional Conduct for Attorneys. Specifically, Rule 1.5(b) requires that the Firm communicate to clients any change in the hourly fee rate.

The Firm, on an annual basis, reviews its billable hour rates and effective December 1 of each year, adjusts the billable hour rates for certain of its attorneys and paralegals. Should you have any questions regarding the billable hour rates for any attorney(s) or paralegal(s) please contact your attorney at the Firm to discuss.

**CONFIDENTIAL AND PRIVILEGED  
ATTORNEY WORK PRODUCT**

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(330) 497 0700 P.O. BOX 36963  
CANTON, OHIO 44735-6963 FED ID # 34-1295659

Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 02/24/2021  
Source DEB/EDM  
Invoice No. 392788  
Period Ending 02/23/2021  
Matter No. 14226.21-0001

### Remittance Page

Total Fees \$2,031.00  
Total Expenses Advanced \$0.00  
Invoice Total \$2,031.00

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FED ID # 34-1295659

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670 17th St. NW  
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Date 01/28/2021  
Page No. 1  
Source DEB/EDM  
Invoice No. 391576  
Period Ending 01/05/2021

Matter Info: 14226.21-0000

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**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Inits	Description	Hours	Amount
06/03/20	EDM	Received telephone call from Scott Sanders at Fiber Corr re: possible inspection by Massillon Health Department and follow-up conference with Attorney Zurakowski re: possible origins of request; Follow-up telephone conference with Scott Sanders re: same.	0.10	29.00
11/26/20	EDM	Reviewed file materials re: Kosanovich workers' compensation appeal to court; Memorandum to Paralegal McCaslin re: plan of action re: same.	0.20	58.00
Total Professional Charges				87.00
Total Fees				\$87.00
Total Expenses Advanced				\$0.00
Invoice Total				<u>\$87.00</u>



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.21-0000  
\*

DATE 01/28/2021  
PAGE NO. 2  
INVOICE NO. 391576

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Date	01/28/2021
Source	DEB/EDM
Invoice No.	391576
Period Ending	01/05/2021
Matter No.	14226.21-0000

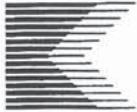
### Remittance Page

Total Fees	\$87.00
Total Expenses Advanced	\$0.00
Invoice Total	<u>\$87.00</u>

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Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
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Date 02/23/2021  
Page No. 1  
Source DEB/MJB  
Invoice No. 392729  
Period Ending 01/31/2021

Matter Info: 14226.15-0001  
GENERAL EMPLOYMENT MATTERS

**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Inits	Description	Hours	Amount
01/13/21	MJB	Legal services rendered re: preparation of termination notice and all drafting, research, revisions, client communication and legal work incidental thereto.	0.80	240.00
<b>Total Professional Charges</b>				<b>240.00</b>
Total Fees				\$240.00
Total Expenses Advanced				\$0.00
<b>Invoice Total</b>				<b><u>\$240.00</u></b>





**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.15-0001  
GENERAL EMPLOYMENT MATTERS

DATE 02/23/2021  
PAGE NO. 2  
INVOICE NO. 392729

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Date 02/23/2021  
Source DEB/MJB  
Invoice No. 392729  
Period Ending 01/31/2021  
Matter No. 14226.15-0001

### Remittance Page

Total Fees \$240.00  
Total Expenses Advanced \$0.00  
Invoice Total \$240.00

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CANTON, OHIO 44735-6963

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670 17th St. NW  
Massillon, OH 44646

Date 01/28/2021  
Page No. 1  
Source DEB/EDM  
Invoice No. 391580  
Period Ending 12/31/2020

Matter Info: 14226.21-0002  
KEBBEH, HAGI 17-144007

**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Init	Description	Hours	Amount
07/26/20	EDM	Attention to Fiber Corr workers compensation matter for Kebbeh and attention to VSSR issues.	0.20	58.00
07/27/20	EDM	Further follow-up re: Kebbeh workers' compensation matter; Reviewed VSSR exposure re: FiberCorr Mills VSSR matter.	0.40	116.00
08/14/20	EDM	Reviewed file materials re: status of VSSR re: Kebbeh workers' compensation matter and reviewed status of intentional tort re: same.	0.20	58.00
09/17/20	EDM	Exchanged emails with client at FiberCorr re: Hagi Kebbeh workers' compensation matter and reviewed upcoming hearing re: same.	0.10	29.00
Total Professional Charges				261.00
			Total Fees	\$261.00
			Total Expenses Advanced	\$0.00
			Invoice Total	<u>\$261.00</u>





**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.21-0002  
KEBBEH, HAGI 17-144007

DATE 01/28/2021  
PAGE NO. 2  
INVOICE NO. 391580

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CANTON, OHIO 44735-6963 FED ID # 34-1295659

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Massillon, OH 44646

Date 01/28/2021  
Source DEB/EDM  
Invoice No. 391580  
Period Ending 12/31/2020  
Matter No. 14226.21-0002

### Remittance Page

Total Fees	\$261.00
Total Expenses Advanced	\$0.00
Invoice Total	<u>\$261.00</u>

THIS INVOICE IS PAYABLE UPON RECEIPT.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.



Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 01/28/2021  
Page No. 1  
Source DEB/EDM  
Invoice No. 391581  
Period Ending 12/31/2020

Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Init	Description	Hours	Amount
06/07/20	EDM	Letter to client re: VSSR demand re: Lamp, evaluated demand re: same and memorandum to Attorney Fike re: exposure letter re: same.	0.20	58.00
06/16/20	EDM	Telephone conference with attorney for Ronald Lamp re: VSSR and possible resolution re: same.	0.20	58.00
06/17/20	EDM	Attention to Lamp VSSR and finalized and sent correspondence to employer of record re: possible resolution re: same.	0.20	58.00
06/19/20	EDM	Received further inquiry from attorney for James Lamp re: VSSR matter.	0.10	29.00
06/19/20	EDM	Follow-up email to client re: same and exchanged emails with client re: VSSR matters and possible settlement.	0.10	29.00
06/22/20	LAF	(Lamp) Review memo from Attorney Murray, review claim file, and revise the draft VSSR exposure/settlement letter to client.	0.40	84.00
06/23/20	EDM	Received further inquiry re: Ronald Lamp VSSR and exchanged emails with attorney for Ronald Lamp re: same.	0.20	58.00
06/25/20	EDM	Telephone conference with Industrial Commission regional manager re: status of Lamp workers' compensation VSSR matter and bankruptcy stay re: same.	0.10	29.00



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

DATE 01/28/2021  
PAGE NO. 2  
INVOICE NO. 391581

Date	Initis	Description	Hours	Amount
06/27/20	EDM	Received and reviewed correspondence re: Lamp VSSR, including attention to issues re: upcoming prehearing conference re: same.	0.10	29.00
06/29/20	TJM	Attention to VSSR settlement correspondence, including review and preparation of documents for settlement file regarding Ronald Lamp.	0.20	20.00
07/01/20	TJM	Preparation of calendaring Industrial Commission pre-hearing conference for Attorney Murray's review regarding Ronald Lamp.	0.20	20.00
07/01/20	TJM	Conference with Attorney Murray re: attention to VSSR settlement correspondence.	0.10	10.00
07/01/20	TJM	Review and preparation of documents for settlement file regarding Ronald Lamp.	0.10	10.00
07/22/20	EDM	Reviewed file materials re: Lampe VSSR and prepared for upcoming pre-hearing conference re: same.	0.30	87.00
07/23/20	EDM	Reviewed file materials re: Lamp VSSR.	0.20	58.00
07/23/20	EDM	Prepared for and attended prehearing conference with Industrial Commission re: same and note to file re: outcome of prehearing conference.	0.80	232.00
07/23/20	TJM	Conference with Attorney Murra re: preparation of letter to Pat Gannon, IC Regional Manager, re in-person merit hearing for filing with the Industrial Commission.	0.10	10.00
07/23/20	TJM	Upload letter to Pat Gannon, IC Regional Manager, re in-person merit hearing to the Industrial Commission for filing via facsimile and electronic communications, receipt, review and preparation confirmation receipt from the Industrial Commission to electronic file.	0.50	50.00
07/23/20	TJM	Attention to VSSR file regarding Ronald Lamp.	0.10	10.00
09/27/20	EDM	Letter to client re: Lamp VSSR; Memorandum re: plan of action re: same.	0.30	87.00
09/29/20	EDM	Finalized and sent correspondence re: Lamp VSSR; Note to file re: same.	0.20	58.00



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

DATE 01/28/2021  
PAGE NO. 3  
INVOICE NO. 391581

Date	Initis	Description	Hours	Amount
09/30/20	LAF	Conference with Attorney Murray re legal research needed on VSSR issue for upcoming hearing.	0.10	21.00
09/30/20	EDM	Conferred with Attorney Fike re: James Lamp VSSR issues and preparation for upcoming hearing.	0.20	58.00
10/01/20	LAF	Research the OAC on the statute of limitations on VSSR amendments and legal research on amending a VSSR application.	1.40	294.00
10/01/20	LAF	Conference with Attorney Soehnlén re additional legal research on errors in VSSR citations to be completed.	0.20	42.00
10/01/20	ZMS	Conferred with Atty Fike re: VSSR research and researched Ohio case law re: whether the citation of one inapplicable VSSR provision related to an applicable VSSR provision is sufficient to give notice to the employer and allow the claimant to pursue an award under the new provision.	2.00	380.00
10/01/20	ZMS	Conferred with Atty Fike re: VSSR research.	0.40	76.00
10/02/20	ZMS	Continued research on uncited VSSR sections being used to give a VSSR award. Drafted brief summary of case law.	1.20	228.00
10/02/20	TJM	Conference with Attorney Murray re: preparation of notice of VSSR merit hearing.	0.10	10.00
10/02/20	TJM	Preparation of letter to Pete Dell enclosing notice of VSSR merit hearing for his review.	0.20	20.00
10/02/20	TJM	Fforward letter and documents to Attorney Murray for review and attention to file regarding Ronald Lamp.	0.20	20.00
10/03/20	EDM	Attention to Lamp workers' compensation matter and reviewed VSSR matter.	0.20	58.00
10/04/20	EDM	Attention to Lamp workers' compensation matter and finalized and sent letter to Pete Dell re: VSSR services re: same.	0.20	58.00
10/05/20	EDM	Reviewed file materials re: Lamp VSSR and followed up with Pete Dell re: possible attendance at hearing.	0.20	58.00



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
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Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

DATE 01/28/2021  
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Date	Inits	Description	Hours	Amount
10/10/20	EDM	Attention to Lamp VSSR matter, including memorandum to Paralegal McCaslin re: preparation for upcoming VSSR hearing re: same.	0.20	58.00
10/21/20	EDM	Attention to Lamp VSSR matter and followed up with special safety violations investigation unit re: same.	0.30	87.00
10/30/20	EDM	Reviewed Ohio Administrative Code re: Lamp defense to VSSR, reviewed issues re: suspension re: same and followed up re: correspondence re: same.	0.40	116.00
10/30/20	TJM	Preparation of calendaring/docketing Industrial Commission hearing for Attorney Murray's review regarding Ronald Lamp.	0.20	20.00
11/03/20	EDM	Further attention to Lamp VSSR matter; Reviewed Ohio Administrative Code re: same; Followed up with opposing counsel re: continuance of hearing; Follow-up with letter to Industrial Commission re: same; Conferred with Paralegal Helmick re: appointment as counsel.	0.30	87.00
11/04/20	EDM	Attention to Lamp VSSR matter and followed up re: suspension of processing re: same.	0.30	87.00
11/06/20	EDM	Received and reviewed research re: VSSR amendment re: Ronald Lamp workers compensation matter and VSSR matter.	0.20	58.00
11/07/20	EDM	Reviewed file materials re: Lamp VSSR matter; Reviewed issues re: same.	0.20	58.00
11/09/20	EDM	Reviewed research re: VSSR amendments re: Ron Lamp and possible validity of defense re: same.	0.20	58.00
11/10/20	EDM	Conferred with Attorney Soehnlén re: Lamp workers' compensation matter; Note to file re: same.	0.20	58.00
11/12/20	ZMS	Researched Ohio case law re: a claimant's ability to amend a VSSR application after the statute of limitations has run. Drafted summary of research findings.	1.00	190.00





**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
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Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

DATE 01/28/2021  
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Date	Initis	Description	Hours	Amount
11/13/20	ZMS	Continued researching Ohio case law re: a claimant's ability to amend a VSSR application after the statute of limitations has run. Continued drafting summary of research findings.	2.50	475.00
11/15/20	EDM	Reviewed file materials re: VSSR matter for Ronald Lamp; Attention to issues re: continuance of hearing and need to update for bankruptcy trustee.	0.30	87.00
Total Professional Charges				3,846.00

**DISBURSEMENTS**

Date	Description	Amount
06/17/20	Copies	0.24
06/19/20	Copies	1.32
07/23/20	Color copies	0.72
07/23/20	Telephone charges	0.63
07/23/20	Copies	1.20
07/24/20	Fax transmittal	3.25
09/29/20	Copies	0.60
09/30/20	Color copies	0.90
09/30/20	Copies	0.60
10/02/20	Color copies	0.36
10/02/20	Copies	0.48
10/05/20	Copies	0.12
10/06/20	Copies	0.24
11/03/20	Copies	0.48
11/04/20	Color copies	0.36
11/04/20	Copies	0.36
11/05/20	Fax transmittal	2.75



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
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Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

DATE 01/28/2021  
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INVOICE NO. 391581

Date	Description	Amount
	<b>Total Disbursements</b>	<b>14.61</b>
	Total Fees	\$3,846.00
	Total Expenses Advanced	\$14.61
	<b>Invoice Total</b>	<b><u>\$3,860.61</u></b>

This notification is the result of a recent update to the Ohio Rules of Professional Conduct for Attorneys. Specifically, Rule 1.5(b) requires that the Firm communicate to clients any change in the hourly fee rate.

The Firm, on an annual basis, reviews its billable hour rates and effective December 1 of each year, adjusts the billable hour rates for certain of its attorneys and paralegals. Should you have any questions regarding the billable hour rates for any attorney(s) or paralegal(s) please contact your attorney at the Firm to discuss.

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Summary of Expenses - Invoice 391581

Copies 47 @ .12 = \$5.64

Color copies 13 @ .18 = \$2.34

Fax Transmittals 12 pages @ .50 = \$6.00

Telephone charges .63 cents

Total \$14.61



(330) 497 0700 P.O. BOX 36963  
CANTON, OHIO 44735-6963 FED ID # 34-1295659

Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 01/28/2021  
Source DEB/EDM  
Invoice No. 391581  
Period Ending 12/31/2020  
Matter No. 14226.21-0003

### Remittance Page

Total Fees \$3,846.00  
Total Expenses Advanced \$14.61  
Invoice Total \$3,860.61

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Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 02/23/2021  
Page No. 1  
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Invoice No. 392732  
Period Ending 02/23/2021

Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Initis	Description	Hours	Amount
12/28/20	EDM	Conferred with Paralegal Helmick re: FiberCorr/Lamp VSSR matter.	0.10	30.00
12/29/20	EDM	Letter to Industrial Commission re: Lamp VSSR matter.	0.10	30.00
12/29/20	EDM	Attention to issues re: prehearing conference re: Lamp VSSR matter.	0.10	30.00
12/30/20	EDM	Reviewed file materials re: Lamp VSSR matter.	0.20	60.00
12/30/20	EDM	Followed up with Industrial Commission re: rescheduling of prehearing conference.	0.10	30.00
01/09/21	EDM	Attention to VSSR materials re: Lamp.	0.10	30.00
01/09/21	EDM	Reviewed file materials re: Memorandum to Attorney Fike re: exposure analysis re: for VSSR.	0.10	30.00
01/13/21	LAF	(Lamp) Conference with Attorney Murray re VSSR code citations and defense strategy re same.	0.10	22.50
01/13/21	EDM	Conferred with Attorney Fike re: Ron Lamp workers' compensation matter.	0.10	30.00
01/13/21	EDM	Reviewed evaluation re: Ron Lamp workers' compensation matter.	0.10	30.00
02/17/21	EDM	Continued preparation for upcoming prehearing conference re: FiberCorr/Lamp matter.	0.40	120.00



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
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LAMP, RONALD 18-215115 VSSR

DATE 02/23/2021  
PAGE NO. 2  
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Date	Inits	Description	Hours	Amount
02/17/21	EDM	Conference call with BWC Law Department and Attorney Jill Whitworth re: conversion issues re: same.	0.20	60.00
02/17/21	EDM	Continued preparation for and attendance in conference call.	0.20	60.00
02/17/21	EDM	Discussed claim status with Regional Manager Pat Gannon, Attorney Whitworth, and Leitzke.	0.40	120.00
02/18/21	EDM	Drafted report letter to client re: outcome of prehearing conference for VSSR re: Ronald Lamp and note to file re: same.	0.20	60.00
Total Professional Charges				742.50

**DISBURSEMENTS**

Date	Description	Amount
12/29/20	Copies 1 @ .12 per copy	0.12
12/30/20	Copies 31 @ .12 per copy	3.72
01/04/21	Fax transmittal 7.50 pages at .50 a page	3.75
01/04/21	Copies 3 @ .12 per copy	0.36
02/03/21	Copies 42 @ .12 per copy	5.04
Total Disbursements		12.99

Total Fees	\$742.50
Total Expenses Advanced	\$12.99
Invoice Total	<u>\$755.49</u>
Previous Balance	\$3,860.61
Total Balance Due	<u>\$4,616.10</u>

**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.21-0003  
LAMP, RONALD 18-215115 VSSR

DATE 02/23/2021  
PAGE NO. 3  
INVOICE NO. 392732

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**OUTSTANDING STATEMENTS**

Date	Invoice No	Balance
01/29/21	390581	3,860.61







(330) 497 0700 P.O. BOX 36963  
CANTON, OHIO 44735-6963 FED ID # 34-1295659

Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 02/23/2021  
Source DEB/EDM  
Invoice No. 392732  
Period Ending 02/23/2021  
Matter No. 14226.21-0003

### Remittance Page

Total Fees	\$742.50
Total Expenses Advanced	\$12.99
<b>Invoice Total</b>	<b><u>\$755.49</u></b>
Previous Balance	\$3,860.61
<b>Total Balance Due</b>	<b><u>\$4,616.10</u></b>

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Date 01/28/2021  
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Source DEB/EDM  
Invoice No. 391582  
Period Ending 12/31/2020

Matter Info: 14226.21-0004  
KOSANOVICH, NICHOLAS 17-156729

**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Inits	Description	Hours	Amount
09/17/20	LAF	Review email from client and attached unemployment documentation.	0.10	21.00
09/17/20	LAF	Confernece with Attorney Murray re status unemployment claim and next steps.	0.10	21.00
09/17/20	EDM	Reviewed unemployment issue re: FiberCor.	0.10	29.00
09/17/20	EDM	Received and reviewed documents re: same and brief conference with Attorney Fike re: same.	0.10	29.00
09/18/20	EDM	Reviewed file materials re: unemployment matters and followed up with Scott Sanders re: recommendation re: same.	0.20	58.00
12/08/20	EDM	Conferred with Paralegal McCaslin re: most recent pleadings and case management order re: Kosanovich workers' compensation matter.	0.10	30.00
<b>Total Professional Charges</b>				<b>188.00</b>
Total Fees				\$188.00
Total Expenses Advanced				\$0.00
<b>Invoice Total</b>				<b><u>\$188.00</u></b>

**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
ATTORNEYS AT LAW

Matter Info: 14226.21-0004  
KOSANOVICH, NICHOLAS 17-156729

DATE 01/28/2021  
PAGE NO. 2  
INVOICE NO. 391582

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Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 01/28/2021  
Source DEB/EDM  
Invoice No. 391582  
Period Ending 12/31/2020  
Matter No. 14226.21-0004

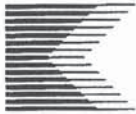
### Remittance Page

Total Fees	\$188.00
Total Expenses Advanced	\$0.00
<b>Invoice Total</b>	<b><u>\$188.00</u></b>

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Date 02/23/2021  
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Invoice No. 392731  
Period Ending 02/23/2021

Matter Info: 14226.21-0004  
KOSANOVICH, NICHOLAS 17-156729

**FOR PROFESSIONAL SERVICES RENDERED:**

Date	Init	Description	Hours	Amount
01/06/21	EDM	Received and reviewed case management order re: Kosanovich workers' compensation matter.	0.10	30.00
01/06/21	EDM	Conferred with Paralegal McCaslin re: Kosanovich workers' compensation.	0.10	30.00
01/14/21	MED	Reviewed scheduling correspondence from court.	0.10	21.50
01/14/21	MEM	Received/reviewed Case Management Order from the Court.	0.30	42.00
01/14/21	MEM	Calendared all pertinent dates per Case Management Order.	0.40	56.00
01/16/21	EDM	Reviewed case management order re: Kosanovich workers' compensation litigation and memorandum to Attorney Fike and Paralegal McCaslin re: same.	0.10	30.00
01/16/21	EDM	Reviewed plan of action and dates approaching in spring of 2020 re: litigation of case.	0.10	30.00
01/23/21	EDM	Reviewed case management order re: dates for trial re: Kosanovich; Note to Paralegal McCaslin re: plan of action re: same.	0.10	30.00
01/25/21	EDM	Telephone conference with opposing counsel re: status of Nick Kosanovich litigation.	0.20	60.00
01/26/21	EDM	Conferred with Paralegal McCaslin re: status of discovery and expert disclosure re: Nick Kosanovich workers' compensation litigation.	0.10	30.00



**KRUGLIAK, WILKINS, GRIFFITHS & DOUGHERTY CO., L.P.A.**  
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KOSANOVICH, NICHOLAS 17-156729

DATE 02/23/2021  
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<b>Total Professional Charges</b>	<b>359.50</b>
Total Fees	\$359.50
Total Expenses Advanced	\$0.00
<b>Invoice Total</b>	<b><u>\$359.50</u></b>
Previous Balance	\$188.00
<b>Total Balance Due</b>	<b><u>\$547.50</u></b>

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**OUTSTANDING STATEMENTS**

<b>Date</b>	<b>Invoice No</b>	<b>Balance</b>
01/29/21	391582	188.00





(330) 497 0700 P.O. BOX 36963  
CANTON, OHIO 44735-6963 FED ID # 34-1295659

Fibercorr Mills, LLC  
Attn: Accounts Payable  
670 17th St. NW  
Massillon, OH 44646

Date 02/23/2021  
Source DEB/EDM  
Invoice No. 392731  
Period Ending 02/23/2021  
Matter No. 14226.21-0004

### Remittance Page

Total Fees	\$359.50
Total Expenses Advanced	\$0.00
<b>Invoice Total</b>	<b><u>\$359.50</u></b>
Previous Balance	\$188.00
<b>Total Balance Due</b>	<b><u>\$547.50</u></b>

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### Summary and Invoices

Category	Time	Fees	Average Hourly Rate	Expenses
General Matters	11.20	\$2,031.00	\$181.34	\$0.00
Employment Matters	24.40	\$5,724.00	\$234.59	\$27.60
TOTALS	35.60	\$7,755.00	\$217.84	\$27.60



Initials	Name	Title	Hours	Rate -2020	Rate - 2021
DEB	David E. Butz	Partner	2.8	\$295.00	\$300.00
EDM	Edward D. Murray	Partner	11.3	\$290.00	\$300.00
SOS	Sam O. Simmerman	Partner	.80	\$285.00	N/A
MJB	Michael J. Bogdan	Partner	.80	N/A	\$300.00
LAF	Lisa A Fike	Associate	2.4	\$210.00	\$225.00
ZMS	Zachary M. Soehnlen	Associate	7.1	\$190.00	N/A
MED	Mathew E. Doney	Associate	.1	N/A	\$215.00
MEM	Meg A. McClasin	Paralegal	.7	\$135.00	\$140.00
RMW	Rebecca M. Weber	Paralegal	.3	N/A	\$140.00
TJM	Tammy J. McCort	Paralegal	2.0	\$100.00	\$100.00
MHP	Mary H. Papadopoulos	Paralegal	7.3	\$125.00	\$125.00

## **EXHIBIT C**

## Summary of Expenses

(Invoice 391581)

Copies 47 @ .12 = \$5.64

Color copies 13 @ .18 = \$2.34

Fax Transmittals 12 pages @ .50 = \$6.00

Telephone charges .63 cents

Total \$14.61

(Invoice 392732)

Copies 77 @ .12 = \$9.24

Fax 7.5 pages @ .50 = 3.75

Total \$12.99

**TOTAL EXPENSES \$27.60**

## **EXHIBIT D**

-----X	
In re:	: Case No. 20-61029
	: (Jointly Administered)
FIBERCORR MILLS, LLC	:
	:
<i>et al.</i> <sup>1</sup>	: Chapter 11
	:
Debtors and	: Judge Russ Kendig
Debtors-in-Possession.	:
	:
-----X	

I, David E. Butz HEREBY CERTIFY THAT:

2. I have read the Application of Krugliak, Wilkins, Griffiths, & Dougherty, Co. L.P.A. for an Interim Allowance of Compensation and Reimbursement of Expenses for the Period June 17, 2020, through February 23, 2021, and Final Allowance of Compensation and Reimbursement of Expenses (the "Application"); that to the best of my knowledge, information,

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and belief, and after reasonable inquiry, the compensation and reimbursement sought in the Application conforms with the Guidelines, except as otherwise specifically noted in the Application; and that the compensation and reimbursement of expenses requested in the Application are at the rates and in accordance with practices that are no less favorable to the debtors in the above-captioned case than those customarily employed by me except as otherwise noted in the Application.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief.

Dated February 24, 2021



Sworn and Subscribed before me by David E. Butz this 24 day of February 2021.

Notary Public



MARY HELMICK PAPADOPOULOS  
Notary Public, State of Ohio  
My Commission Expires 09-12-2021

## **EXHIBIT E**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION, CANTON**

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In re:	: Case No. 20-61029
	: (Jointly Administered)
FIBERCORR MILLS, LLC	:
	:
<i>et al.</i> <sup>1</sup>	: Chapter 11
	:
Debtors and	: Judge Russ Kendig
Debtors-in-Possession.	:
	:
-----X	

**ORDER APPROVING FIRST AND FINAL APPLICATION OF KRUGLIAK, WILKINS,  
GRIFFITHS, & DOUGHERTY, CO., LLP FOR AN ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF  
EXPENSES INCURRED**

This matter having come before the Court upon the Application of Krugliak, Wilkins, Griffiths, & Dougherty, Co., LLP (“KWGD”) for an Allowance of Compensation for Services Rendered Docket No. \_\_\_\_\_ (the “KWGD Application”).

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<sup>1</sup> The Debtors are FiberCorr Mills, LLC (EIN xx-xxx3852) Case No. 20-61029, Cherry Springs of Massillon II, LLC (EIN xx-xxx1706) Case No. 20-61030, and Shew Industries Inc. (xx-xxx0322) Case No. 20-61031.

The Court having reviewed the KWGD Application, and taking notice that no objection to the KWGD Application has been filed; and the Court finding that:

1. The Court had jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157 (b)(2)(B). Venue of the Debtors' chapter 11 case and the KWGD Application is proper pursuant to 28 U.S.C. §§ 1408 and 1409 and Local Bankruptcy Rules.

2. KWGD is a duly appointed professional in the above-captioned debtors' ("Debtors") chapter 11 case.

3. Service and notice of hearing of the KWGD Application was adequate under this Court's orders, the Bankruptcy Code, and all applicable Bankruptcy Rules.

4. The fees requested in the KWGD Application in the amount of \$7,755.00 and expenses incurred in the amount of \$27.60 are reasonable and are allowed as actual, necessary services rendered by KWGD pursuant to this Court's orders and sections 330 and 331 of the Bankruptcy Code, 11 U.S.C. §§ 101-1330.

5. The fees and expenses requested to be allowed as final in the amounts of \$7,782.60 are reasonable and are allowable as actual, necessary services rendered by KWGD pursuant to the Court's orders and section 330 and 331 of the Bankruptcy Code, 11 U.S.C. §§ 101-1330.

**IT IS HEREBY ORDERED THAT:**

A. The fees and expenses requested in the KWGD Application are hereby allowed in the amount of \$7,782.60.

B. The Debtors shall be, and hereby are, authorized and directed to pay KWGD the amount of \$7,782.60.

C. The fees and expenses requested to be allowed as final in the amounts of \$7,782.60 are reasonable and are allowable as actual, necessary services rendered by KWGD pursuant to the Court's orders and section 330 and 331 of the Bankruptcy Code, 11 U.S.C. §§ 101-1330.

###

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AND DEBTORS IN POSSESSION